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December 23, 1996

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket No. 96-45

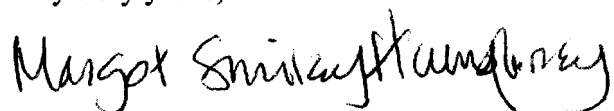
Dear Mr. Caton:

On behalf of TDS Telecommunications Corporation (TDS Telecom) and Century Telephone Enterprises, Inc. (Century), this will correct an inadvertent omission from page one of the comments filed December 19, 1996, in the above-captioned proceeding. The replacement pages also contain a new signature page for the document, in case the original submission reflected that it was signed but did not bear an original signature, and a signed signature page for the Certificate of Service.

We respectfully request that these replacement pages be substituted for pages one, 46, and page 3 of the Certificate of Service in the document as filed. We are also providing corrected pages for the additional copies filed with the Commission and mailed to the official service list for the proceeding.

In the event of any questions concerning this matter, please communicate with this office.

Very truly yours,



Margot Smiley Humphrey

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	

COMMENTS OF TDS TELECOM AND CENTURY TELEPHONE ENTERPRISES, INC.

TDS Telecommunications Corporation (TDS Telecom or TDS) and Century Telephone Enterprises, Inc. (Century), by their attorneys, submit these comments on the Recommended Decision of the Joint Board in the above-captioned proceeding,¹ in response to the Common Carrier Bureau's November 18, 1996 request (DA 96 1891) (Request). TDS Telecom and Century own 105 and 36 small and primarily rural incumbent local exchange carriers (ILECs), respectively, in a combined total of 32 states. Each of these 141 ILECs fits the 1996 Act's definition of a "rural telephone company" (RLEC) (47 U.S.C. §153). (47)).² TDS and Century have been active participants in this proceeding on behalf of their RLECs. Their

¹Federal -State Joint Board on Universal Service, CC Docket No. 96-45, FCC 96J-3 (released Nov. 8, 1996) (Recommendation).

²Pub. L. No. 104-104, 110 Stat. 56. Citations herein will be to the Communications Act of 1934, as amended by the 1996 Act and codified at 47 U.S.C. §§151 et seq. ("the Act") or to the "1996 Act."

provides sufficient support to satisfy the statutory standards that rates are "just, reasonable and affordable," that rural customers will have access to advanced and information services and that rates and services in rural and urban areas are "reasonably comparable";

4. Reject the recommendation to terminate support for additional residential and multiline business connections, in recognition that the traditional tacit assumption that "per line" cost, support or revenue measurements are cost-based is incorrect, since most of the cost is incurred for the first line;

5. Allow for investments after 1995 by permitting adjustments to frozen transitional support and allowing for a healthy investment growth suited to an advancing, globally competitive telecommunications infrastructure;

6. Permit RLECs to disaggregate interim support by zones, density or factors modeled on proxy disaggregation, to prevent windfall support for their competitors who use their lines for below cost prices; and

7. Refrain from wasting time and resources in pursuing competitive bidding proposals that will not pass muster under the law.

Respectfully submitted,

TDS TELECOMMUNICATIONS CORPORATION

and

CENTURY TELEPHONE ENTERPRISES, INC.

By Margot Smiley Humphrey
By /s/ Margot Smiley Humphrey

Margot Smiley Humphrey

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December 19, 1996

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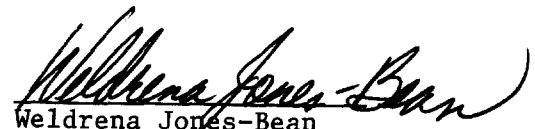
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